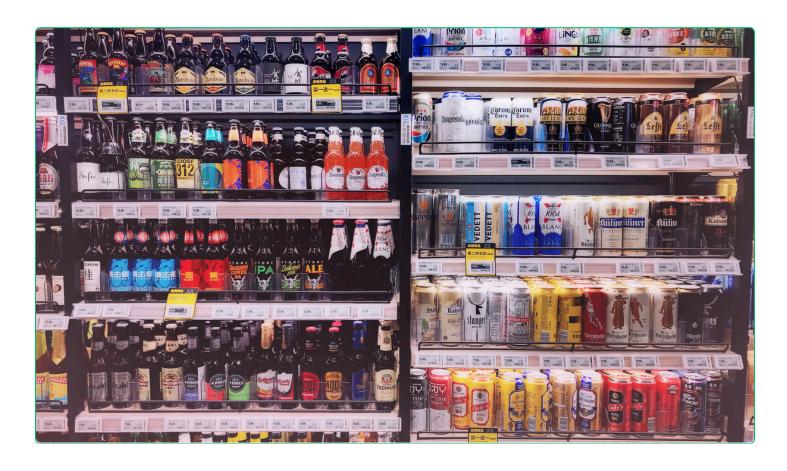


# PROTECTING OUR PLANET

A NATURE 2030 WHITE PAPER | OCTOBER 2024



Why glass bottles should be included in the UK's deposit return scheme.











This research briefing has been supported by: Nature 2030; Keep Wales Tidy; Keep Scotland Beautiful; Keep Northern Ireland Beautiful; and City to Sea.

## What are deposit return schemes?

Nearly 50 deposit return scheme (DRS) models have been introduced in countries across the globe. Their primary aim is to increase recycling rates and tackle littering that poses a threat to animals, natural habitats and the public.

The DRS works by charging a small deposit on drinks containers at the point of purchase, which can be redeemed when recycled through a bottle bank. The most successful DRS models can see recycling rates increased up to 97 per cent and are central to creating circular economies (where materials are able to be reused and recycled for long periods of time) and meet our net zero ambitions.

## The UK Government's approach to the DRS

DRS proposals in Wales and Scotland initially set out plans to follow the majority of other European countries to include PET plastic bottles, glass bottles and metal. Despite this approach creating a high level of environmental protection and yielding strong recycling rates, the UK Government later excluded glass bottles from the scheme and delayed its introduction until October 2027.

The then DEFRA minister explained this decision was driven by glass reportedly "adding cost and complexity to the scheme", while adding "consumer inconvenience". [1] Instead, the UK Government said glass would fall under the Extended Producer Responsibility (EPR) scheme, which places glass recycling rates on producers and requires them to pay for the cost of waste packaging generated by households.

In the face of a wealth of evidence from environmental advocacy organisations, national consumer polling, and international examples of best practice, the decisions made by former ministers risks jeopardising efforts to tackle the UK's waste crisis and create a circular economy.

## The case for glass inclusion

#### **Environment**

The environmental case for taking a broad approach to taking litter and waste is clear. Drinks-related litter was found on 93 per cent of beaches surveyed across England, with an average of 28 items pet 100 metre stretch. Of these, glass was the third most common item collected, after PET plastic pieces and cigarette stubs. Glass beverage bottles were also the seventh highest discarded packaging item globally by the 2021 International Costal Cleanup.[2]

Meanwhile, Planet Patrol data suggests that glass bottles made up 4 per cent of all pieces of litter recorded in their app from April to December 2019.[3] Meanwhile figures in Scotland, based on estimates of 15,000 tonnes of litter dropped and clearer each yet, suggests that 1,365 tonnes of this is packaging glass, beating PET plastic bottles at 1,290 tonnes and metal cans at 600 tonnes.[4]

#### **Business**

Supporting consumers and businesses to do the right thing is vital. Businesses overwhelmingly support the introduction of an all-in DRS that encompasses PET bottles, aluminium cans, and glass bottles. Furthermore, freedom of information requests to DEFRA shows major supermarkets such as Tesco and Sainsbury's, as well as producers such as Nestle and Heineken, are supportive of introducing the DRS as quickly as possible, and to include glass within it to maximise the UK's environmental protections. This view has also been echoed by a range of SME trade associations. [5] [6]

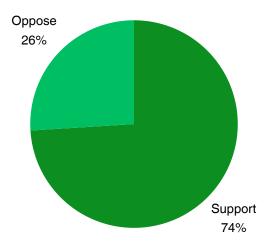
However, while industry leaders recognise the need to address glass bottles in the form of soft drinks and beers, there is recognition of the unique challenges presented by producers of glass bottles in the form of wine and whisky bottles. It is for this reason that ministers should consider excluding the latter two forms of beverage packaging in the proposed DRS.

#### **Political**

UK-wide polling commissioned by environmental campaign group Nature 2030 found that consumers are overwhelmingly in favour (75 per cent) of a DRS that includes the original three types of proposed beverage containers and are radically opposed to the exclusion of glass bottles.[7] In addition, eight out of 10 Scots support maintaining glass in the proposed DRS.[8] Meanwhile, YouGov polling in Wales shows strong support for an 'all-in' scheme, with support from seven in 10 people.[9]

This follows a cross-party grouping of 26 MPs who called on the Government to back an 'all-in' DRS for drinks containers in 2020. The EDM maintained that a system including "as a wide a selection of materials as possible" is needed to tackle the UK's waste problem.[10] Since January 2023, nearly 20 Written Questions have been submitted by MPs in relation to the Government's approach to glass.[11] These questions, from Conservative, Labour, SNP and Liberal Democrat MPs, unanimously imply support for the speedy introduction of a DRS with strong environmental safeguards.

**Graph 1** demonstrates strong support for public support for a "wideranging deposit return scheme"



Polling conducted by Yonder on behalf of Nature 2030 of 2,069 adults between 6-8th September 2024. The figures have been weighted and are representative of all UK adults (aged 18+)

#### International

Decisions made by the last government to exclude all glass bottles could incentivise consumers to move away from aluminium cans and PET plastic bottles and will increase consumer confusion. Glass is also the most carbon intensive material of any beverage packaging type so this could in turn lead to increased emissions. Removing it from a DRS, with a collection target of 90 per cent to be in Extender Producer Responsibility (EPR), where the glass collection target is only 83 per cent by 2030, provides a distorted market advantage to glass producers and ultimately harms our environmental ambitions.

The UK is falling behind our neighbours on recycling. Recycling rates in the UK stand at 82 per cent for aluminium cans; 76 per cent for glass bottles; and 59 per cent for PET plastic bottles.[12] [13] [14] The UK performs poorly in terms of the collection and recycling of glass bottles, with the EU average standing at 80 per cent, with Switzerland enjoying a rate of 95 per cent and Slovenia of 98 per cent.[4]

'All-in' schemes are common across the world – from the 50 international schemes, 46 include glass, while those excluding glass already have a returnable system in place for glass to negate its environmental impact. Canada's DRS goes even further to include cartons, bags in boxes, and even plastic pouches.

## Tackling common misperceptions

"Keeping glass bottles out of all schemes in the UK would remove major interoperability issues, creating a level-playing field for producers without additional cost or complexity."

Not including glass bottles in the system would actually damage the initially proposed level playing field where all beverage packaging types (PET plastic pottles; glass bottles; and metal cans) would have been included in the DRS. Removing glass from the DRS would make categories like beer in metal cans proportionally more expensive than glass, and increase emissions if producers switch to it, given the high carbon-intensity involved in processing and recycling glass.

The Welsh Government' position is that the Internal Markets Act 2020 does not prevent the introduction of their current DRS policy. However, the UK Government, prior to the 2024 General Election, attempted to prevent Wales and Scotland from diverging from their models.[16] Despite this, there is a strong consensus of a need for a consistent policy across the four nations of the UK.

#### "Business doesn't want a DRS"

Businesses and environmental groups want consistency and fairness. Given the global nature of supply chains and indeed pollution, the UK ought to follow existing best practice in the vast majority of other nations, with a glass-inclusive approach.[17] The response to the UK Government's consultation on the introduction of a DRS in the UK showed huge business and public support for the inclusion of PET plastic bottles, metal cans and glass bottles.

Business and trade associations including British Beer and Pub Association (BBPA), British Retail Consortium, British Soft Drinks Association (BSDA), Diageo, Heineken, Nestle, Sainsbury's, Tesco and Marks & Spencer all supported the introduction of glass in the DRS.[18]

#### "The public doesn't want glass in a DRS"

National consumer polling has consistently demonstrated public support for the timely introduction of an ambitious DRS for a number of years.

- '64% of people surveyed also said they support the introduction of a deposit return scheme (DRS) for plastic and glass bottles, as well as aluminium cans. (February 2024)
- '84% of public support 'all-in' DRS for drinks containers' (June 2020)
- 'Poll finds 'three-quarters of Brits' want glass included in DRS' (Jan 2023)
- 'Poll: Glass should be in DRS for all UK nations, say Scots' (May 2023)
- Keep Britain Tidy 'Pain in the Glass' campaign when the public was asked which materials should be included in a Deposit Return Scheme, glass bottles were the most requested (78%), above PET plastic bottles (74%) and aluminium cans (70%) (May 2022)
- Welsh Report: Consumer research to inform the design of an effective Deposit Return Scheme' (2019): 74% of adult survey participants supported a DRS and between 77% and 83% of survey participants reported they would use a DRS on all or most occasions for all five types of containers explored

## "Glass is one of the most sustainable materials on earth - it is 100% recyclable and can be remelted endlessly without ever reducing its quality."

Recyclability alone is not a measurement of sustainability and claims of "most sustainable materials" without substantiating the claim and providing specific context is classed as greenwashing. The manufacture and recycling of glass is highly carbon-intensive given the high temperatures required when processing the material.

To the contrary, a study from the University of Southampton found "glass bottles are amongst the most environmentally impactful". Similar results were also found by the Swedish Brewers Association[19][20].

#### "Glass is already achieves an 87.3% glass collection rate in Wales."

Collection rates are not the same as recycling rates and process losses (for example, breakages) need to be considered.[21] This number also includes no bottle packaging (like jars) that are predominantly consumed at home.

The overall collection rates for glass containers (including jars) in the UK is 74% and is a key reason why glass bottles should be included in a DRS, proving that collection rates will not increase enough under an EPR alone. For context, glass outside of the DRS will only be subject to an EPR collection target of 80% whilst cans and PET bottles will be subject to a minimum 90% target.[22]

The recycling rates of some beverage packaging that will be included in the UK DRS is already higher than the glass figure. According to Eunomia, the collection rate of glass bottles in the UK was only 71% (2019) but closed loop recycling (bottle to bottle) was only 43%, showing that circa 30% of the material is lost or downgraded.[23]

## The new government's approach



Mary Creagh MP was announced as the new Minister for Nature in July 2024, taking responsibility for the circular economy and DRS policy in DEFRA. In response to questions from MPs prior to the summer recess, Creagh confirmed the Government would be undertaking a full review of the DRS, including speaking with stakeholders, industry and the devolved governments.[24]

This forms part of the DEFRA's rapid review of decisions taken by former ministers in relation to the circular economy. This is set to conclude by the end of 2024 and will focus on creating green jobs, ensuring the UK economy prospers, and nature thrives.[25]

However, in response to a parliamentary written question in October 2024, Creagh confirmed the Government's intention to exclude glass from the scheme in England and Northern Ireland. No further details or impact assessments in relation to the operation or scope of the proposed DRS have yet been published. [26]

## The way forward

Ongoing delays created by the last administration have cost both businesses as the devolved administrations, with the collapse of Circularity Scotland, the very firm set up to run the scheme, seeing £9 million of taxpayer's money wasted.[27]

This demonstrates there is clear a need for a consistent and ambitious DRS policy across the UK which creates certainty for businesses and meets the calls to action from environmental campaigns including Keep Britain Tidy; the Marine Conservation Society; City to Sea; A Plastic Planet; and Surfers Against Sewage.

In practice, this would see the introduction of a model which covers aluminium cans, PET plastic bottles, and glass used for soft drinks and beers. However, following concerns expressed by industry, and identified above, specialist types glass bottles, such as those used by the wine and whisky industries should not be included within the DRS.

Ultimately, an approach which sees the inclusion of glass bottles for soft drinks and beers included in the DRS is a strong compromise, which would: support packaging manufacturers; ensure equity between industries and avoid unfair market distortions; and boost recycling rates across the UK to help create strong environmental protections, in line with our European neighbours.

## "The is a clear need for a consistent and ambitious DRS policy across the UK."

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